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September 30, 2002

Mr. Reginald Pallesen
U.S. EPA
Office of Regional Counsel
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Ms. Ruth A. Miles
U.S. EPA - Region 5
Emergency Enforcement & Support Section SE - 5J
77 West Jackson Boulevard
Chicago, IL 60604-3590

RE: General Oil Site, Ford Pond Operable Unit,
Northville, Wayne County, Michigan



Dear Mr. Pallesen:

As you know, General Oil Company ("GOC") responded to your office verbally upon receipt of the letter from EPA that was received by GOC on September 5, 2002 in reference to the above-named site. This letter serves as GOC's written response to the EPA letter.

GOC was surprised to learn through the EPA letter that the responsibility for investigation and, if necessary, work at the site was transferred to EPA from the Michigan Department of Environmental Quality ("MDEQ"). Since the mid-1990s, the State of Michigan through MDEQ has taken the responsibility for work at the site. Since that time, MDEQ has been involved in extensive site investigation. In addition, MDEQ oversaw the installation of a free product interceptor trench and recovery well at the site.

GOC is not liable under Michigan environmental laws for investigating or undertaking work at the site because GOC did not cause or contribute to the contamination in any way. Nevertheless, over a period of several years, GOC has expended significant resources toward achieving the objectives of MDEQ's initial response activities. In fact,

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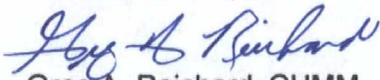
GOC was integrally involved in cooperating with MDEQ and the D.A. Stuart Company of Chicago to install the free product interceptor trench and recovery well. MDEQ's project managers and staff recognized that GOC was involved in the project as a concerned corporate citizen, not as a potentially liable party.

GOC believes that its significant contribution toward MDEQ's investigation and cleanup of Ford Pond equals or exceeds any share of responsibility GOC could be apportioned. GOC suggests that the potentially responsible parties that are listed in the attachment to EPA's letter bear the cost of any additional investigation or response activity that may be required. GOC will continue to cooperate with EPA and the responsible parties regarding site information and, if necessary, site access, but should not be required to contribute additional resources toward the investigation or remediation work.

GOC trusts that this correspondence adequately responds to the EPA letter. Please feel free to contact my office at 734.266.6500 if you should have any questions or comments.

Sincerely,

General Oil Co., Inc.



Greg A. Reichard, CHMM
Environmental Manager

Cc: Timothy A. Westerdale, President General Oil Company, Inc.
Kathryn A. Buckner, Counsel